

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

PEARSON EDUCATION, INC. and
MCGRAW-HILL GLOBAL EDUCATION
HOLDINGS, LLC,

Plaintiffs,

v.

C & N LOGISTICS, INC., RUSSELL TODD
WHITE, and SHAWN CHADWELL,

Defendants.

Case No. 3:18-cv-00438

Judge Waverly D. Crenshaw, Jr.
Magistrate Judge Barbara D. Holmes

**MOTION FOR ENTRY OF
STIPULATED CONFIDENTIALITY AND PROTECTIVE ORDER**

Plaintiffs hereby move this Court for entry of the attached Stipulated Confidentiality and
Protective Order.

Respectfully submitted,

By: s/ Michael A. Johnson

John J. Griffin (#15446)
Michael A. Johnson (#30210)
KAY GRIFFIN, PLLC
222 Second Avenue North, Suite 340M
Nashville, TN 37201
Telephone: (615) 742-4800
john.griffin@kaygriffin.com
mjohnson@kaygriffin.com

Matthew J. Oppenheim (admitted *pro hac vice*)
Michele H. Murphy (admitted *pro hac vice*)
OPPENHEIM & ZEBRAK, LLP

5225 Wisconsin Ave, NW, Suite 503
Washington, DC 20015
Telephone: (202) 480-2999
matt@oandzlaw.com
michele@oandzlaw.com

*Attorneys for Plaintiffs Pearson Education, Inc.
and McGraw-Hill Global Education Holdings,
LLC*

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of August, 2018, a true and exact copy of the foregoing Stipulated Confidentiality and Protective Order has been served on Defendants C & N Logistics, Inc. and Todd White via ECF and on Defendant Shawn Chadwell via email per agreement of the parties.

s/ Michael A. Johnson
Michael A. Johnson